

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

COINLAB, INC., a Delaware Corporation

Plaintiffs,

MT. GOX KK, a Japanese corporation and
TIBANNE KK, a Japanese corporation.

Defendant.

Case No. 2:13-cv-00777-MJP

**NOTICE OF BANKRUPTCY
FILING AND TEMPORARY STAY**

PLEASE TAKE NOTICE that plaintiff CoinLab, Inc. has received notice that on March 9, 2014, defendant Mt. Gox KK filed a Verified Petition for Recognition and Chapter 15 Relief in the United States Bankruptcy Court for the Northern District of Texas, Case No. 14-31229-15. On March 10, 2014, the Bankruptcy Court entered an Order Granting Application for Provisional Relief, Scheduling Recognition Hearing, and Specifying Form and Manner of Notice (“Order”). A true and correct copy of the Order is attached hereto as Exhibit A.

THE ORDER PROVIDES THAT “SECTION 362 OF THE BANKRUPTCY CODE IS APPLICABLE TO THE DEBTOR AND ITS ASSETS UNTIL FURTHER ORDER OF THIS COURT, OR AS SO ORDERED AT THE RECOGNITION HEARING.”

1 Section 362 provides for, among other things, a stay of any judicial action or
2 proceeding against the debtor. 11 U.S.C. § 362. This Section 362 relief applies only to the
3 proposed debtor in the Chapter 15 proceeding, Mt. Gox KK, not to its co-defendant in this
4 action, Tibanne, KK. At the hearing in the Bankruptcy Court on this matter, Mt. Gox's
5 counsel argued that the stay should also apply to affiliates of the debtor, including Tibanne
6 KK. In issuing its ruling, the Bankruptcy Court expressly rejected this request and held that
7 the stay could only apply to the proposed Chapter 15 debtor.

Dated this 11th day of March, 2014.

BRESKIN JOHNSON & TOWNSEND PLLC

By: /s/ Roger M. Townsend
Roger M. Townsend, WSBA No. 25525
Breskin Johnson & Townsend PLLC
1111 Third Avenue, Suite 2230
Seattle, WA 98101
rtownsend@bjtlegal.com
Phone: (206) 652-8660
Fax: (206) 652-8290

SUSMAN GODFREY LLP
By: /s/ Edgar Sargent
Edgar Sargent, WSBA No. 28283
By: /s/ Floyd Short
Floyd Short, WSBA No. 21632
By: /s/ Lindsey Godfrey Eccles
Lindsey Godfrey Eccles, WSBA No. 33566
Susman Godfrey LLP
1201 3rd Ave Ste 3800
Seattle, WA 98101-3087
esargent@susmangodfrey.com
fshort@susmangodfrey.com
leccles@susmangodfrey.com
Phone: (206) 516-3895
Fax: (206) 516-3883

Attorneys for Plaintiff CoinLab, Inc.

**NOTICE OF BANKRUPTCY FILING AND
AUTOMATIC STAY**
Case No. 2:13-cv-00777
Page 2 of 2
2839265v1/013730

SUSMAN GODFREY L.L.P.
1201 Third Avenue, Suite 3800
Seattle, WA 98101-3000
Tel: (206) 516-3880; Fax: (206) 516-3883

CERTIFICATE OF SERVICE

I hereby certify that on March 11, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record who have registered for electronic notifications, and I caused the foregoing to be served upon the following by email:

Dated: March 11, 2014

By: /s/*Edgar Sargent*